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May 26, 2016

Chief Judge Carla E. Craig
U.S. Bankruptcy Court, EDNY
Conrad B. Duberstein Courthouse
271-C Cadman Plaza East - Suite 1595
Brooklyn, NY 11201-1800

Re: LRB Nurses Registry, Inc., Chapter 11, Case No. 15-45532 (CEC)

Dear Honorable Judge Craig:

We write this letter with regard to a motion filed on shortened notice in the case of LRB Nurses Registry. I was retained on May 17, 2016, by Abraham Greenhut, to attempt to negotiate a good faith settlement with the Debtor or alternately reply to a motion to compel bid which the Debtor's counsel was directed to file on April, 20, 2016. On the day of my retention, I contacted the office of Ortiz & Ortiz and spoke to Ms. Ortiz to inform her that my clients intend to make an offer. I presented an offer to Martha J. de Jesus, Esq., in Ms. Ortiz's office. We received no reply until this morning, on 5/26/16. On the afternoon of 5/25/16 Ms. Ortiz's office filed the motion to compel the bid, on shortened notice, to be returnable on Wednesday, June 1st. We respectfully submit, that filing on the 25th, on shortened notice, returnable on the 1st, taking into account the Memorial Day holiday on the 30th, leaves three days for my clients to reply to the motion. One of my clients is out of the country and generally, we respectfully submit, that such a deadline prejudices my client by purposefully disallowing fair time to reply, even on shortened notice. We hereby

respectfully request an extension of time to answer the motion to Tuesday, June 7th, or other such time that the court deems appropriate.

Sincerely,

Alla Kachan, Esq.